UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

No. _____-CR-

18 U.S.C. 371
M/S 10,000 - 5

UNITED STATES OF AMERICA	)
	)
v.	)
	)
RENE JAURES LEON;	)
MARTIN FRANCIS XAVIER CASEY;	)
LAWRENCE JAMES CARLIN	)
HOWARD KENNETH DAVIS;	)
RALPH GRANT EDENS;	)
CHARLES SMITH;	)
EDMUND KOLBY	)

The Grand Jury charges:

That from in or about March, 1969 and continuously thereafter up to and including June 4, 1969, in the Southern District of Florida and elsewhere, the defendants

RENE JAURES LEON;
MARTIN FRANCIS XAVIER CASEY;
LAWRENCE JAMES CARLIN;
HOWARD KENNETH DAVIS;
RALPH GRANT EDENS;
CHARLES SMITH;
EDMUND KOLBY

unlawfully, wilfully and knowingly did conspire with each other, and with William J. Dempsey, a co-conspirator but not a defendant herein, and with divers other persons to the Grand Jury unknown, to violate the laws of the United States, to wit, Title 18, United States Code, Section 960 in the manner and by the means hereinafter set forth.

1. It was the plan of the said conspiracy to knowingly, wilfully and unlawfully begin and set on foot, and to provide and prepare the means for, and to furnish money for and to take part in military expeditions and enterprises to be carried on from within the United States against the Republic of Haiti, a foreign state with which the United States, at all times mentioned herein, has been and is now at peace.

2. It was a part of said conspiracy that the said defendants and co-conspirators would establish and cause to be established in the Southern District of Florida a military training camp for the purpose of training persons to participate in military expeditions and enterprises against the Republic of Haiti.

3. It was a part of the said conspiracy that the said defendants and co-conspirators would make arrangements to acquire an airplane and other means of transportation to be used in a military expedition and enterprise against the Republic of Haiti.

4. It was also a part of said conspiracy that the said defendants and co-conspirators would transport and cause to be transported from the Southern District of Florida to the Republic of Haiti, by way of the Bahama Islands, metal drums containing a flammable liquid, to be dropped from an airplane while flying over the Republic of Haiti.

5. It was further a part of said conspiracy that some of the said defendants and co-conspirators would fly and be flown in an airplane from the Southern District of Florida to the Bahama Islands, where armed men were to be placed aboard the said airplane and flown to the Republic of Haiti for the purpose of engaging in a military expedition and enterprise against the Republic of Haiti.

In pursuance and furtherance of the said conspiracy and to effect the objects thereof, the said defendants and their co-conspirators did commit in the Southern District of Florida and elsewhere, the following overt acts, among others:

OVERT ACTS

1. On or about May 16, 1969, Ralph Grant Edens, a defendant herein, using the name Ree G. Evans, visited the office of the Port Director of Customs at Key West, Florida, within the Southern District of Florida.

2. On or about June 1, 1969, Lawrence James Carlin, a defendant herein, engaged in a telephone conversation with Marvin Simpson, who was then at Hialeah, Florida, within the Southern District of Florida.

3. On or about June 2, 1969, Howard Kenneth Davis, a defendant herein, assisted Marvin Simpson in placing some metal drums aboard an airplane at Miami International Airport, within the Southern District of Florida.

4. On or about June 3, 1969, Lawrence James Carlin and Howard Kenneth Davis, defendants herein, traveled by airplane, together with Marvin Simpson and William Eugene Dernbach, from Miami International Airport, within the Southern District of Florida, to South Caicos, Bahama Islands.

5. On or about June 4, 1969, Lawrence James Carlin, Howard Kenneth Davis, Martin Francis Xavier Casey, Rene Jaures Leon, Ralph Grant Edens, Edmund Kolby, and Charles Smith, defendants herein, traveled by airplane, together with William John Dempsey, a co-conspirator but not a defendant herein, and Marvin Simpson and William Eugene Dernbach, from Great Exuma Island, Bahama Islands to the air space over the territory of the Republic of Haiti.

All in violation of Title 18, United States Code, Section 371.

A TRUE BILL

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Foreman

_____
William A. Meadows, Jr.
United States Attorney